

1 LOZEAU DRURY LLP
2 Rebecca Davis (SBN 271662)
rebecca@lozeaudrury.com
3 1939 Harrison St., Suite 150
Oakland, CA 94612
Telephone: (510) 836-4200
4 Facsimile: (510) 836-4205

5 WOODROW & PELUSO, LLC
Patrick H. Peluso Col. Bar No. 47642*
6 ppeluso@woodrowpeluso.com
Steven L. Woodrow Col. Bar No. 43140*
7 swoodrow@woodrowpeluso.com
3900 East Mexico Avenue, Suite 300
8 Denver, Colorado 80210
Telephone: (720) 213-0675
9 Facsimile: (303) 927-0809

10 *Appearing *Pro Hac Vice*

11 *Attorneys for Plaintiffs*

12 SHEPPARD MULLIN RICHTER & HAMPTON LLP
JAY T. RAMSEY Cal. Bar. No. 273160
13 1910 Avenue of the Stars, Suite 1600
Los Angeles, California 90067-6055
14 Telephone: 310.228.3700
Facsimile: 310.228.3701
15 Email: jramsey@sheppardmullin.com

16
17 *Attorneys for Defendant What If Holdings, LLC*
d/b/a C4R Media Corp.

18
19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

21 LORETTA WILLIAMS, individually and on
behalf all others similarly situated,

Case No. 3:22-cv-3780-WHA

Assigned to the Hon. William Alsup

22 Plaintiffs,

**STIPULATION TO EXTEND DEADLINE
TO RESPOND TO CLASS ACTION
COMPLAINT [L.R. 6-1(a)]**

23 v.
24 WHAT IF HOLDINGS, LLC d/b/a C4R
MEDIA CORP., and ACTIVEPROSPECT,
INC.

25
26 Complaint Filed: June 27, 2022
Defendants. Trial Date: None Set

27

28

1 Pursuant to Local Rule 6-1(a), Plaintiff Loretta Williams (“Plaintiff”) and Defendant What
2 If Holdings, LLC (“Defendant”), by and through their respective counsel, stipulate as follows:

3 **RECITALS**

4 1. WHEREAS, on June 27, 2022, Plaintiff filed the *Class Action Complaint* against
5 Defendant in this action. Dkt. 1.

6 2. WHEREAS, on July 18, 2022, Plaintiff filed a *Proof of Service* claiming service of
7 the *Summons* and *Class Action Complaint* on July 1, 2022. Dkt. 16.

8 3. WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Defendant’s original
9 deadline to respond to the *Class Action Complaint* was July 22, 2022.

10 4. WHEREAS, the parties conferred, and agreed to extend Defendant’s deadline to
11 answer or otherwise respond to the *Class Action Complaint* by 38 days from July 22, 2022 to August
12 29, 2022.

13 5.. WHEREAS, the parties have conferred, and have agreed to extend Defendant’s
14 deadline to answer or otherwise respond to the *Class Action Complaint* by an additional 14 days
15 from August 29, 2022 to September 12, 2022.

16 6. WHEREAS, pursuant to Local Rule 6-1(a), no Court order is required to extend the
17 time within which to answer or otherwise respond because the change will not alter the date of any
18 event or deadline already fixed by Court order.

19 **STIPULATION**

20 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through
21 their respective counsel, that Defendant’s deadline to answer or otherwise respond to the *Complaint*
22 shall be extended 14 days from August 29, 2022 to September 12, 2022.

23 **IT IS SO STIPULATED.**

24 LOZEAU DRURY LLP

25 Dated: August 26, 2022

By _____ /s/ *Rebecca Davis*
26 REBECCA DAVIS

27 *Attorney for Plaintiffs*
28 LORETTA WILLIAMS

1 SHEPPARD, MULLIN, RICHTER, & HAMPTON LLP
2

3 Dated: August 26, 2022

4 By _____
5 /s/ Jay T. Ramsey
6 JAY T. RAMSEY

7 *Attorneys for Defendant*
8 WHAT IF HOLDINGS, LLC

9 **ATTORNEY'S E-FILING ATTESTATION**

10 As the attorney e-filing this document, and pursuant to Local Rule 5-1(i)(3), I hereby attest
11 that counsel for Plaintiff Loretta Williams whose electronic signature appears above has concurred
12 in this filing.

13 August 26, 2022

14 /s/ Jay T. Ramsey
15 Jay T. Ramsey

16 SMRH:4871-9325-0859.1